

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

KEY COMMUNICATIONS, LLC

And

KEYSTONE WIRELESS, LLC

For Waiver of Deadlines for

Implementation of Phase II E911

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CC Docket No. 94-102

To The Commission

REQUEST FOR EXTENSION OF TIME

Key Communications, LLC ("Key") and Keystone Wireless, LLC ("Keystone") (collectively, "Petitioner-Small Carriers"), by their attorneys, hereby request an extension of time of thirty days within which to supplement their respective showings in support of their pending E911 waiver requests. In support whereof, the Petitioner-Small Carriers state as follows:

Key is a small, privately-held carrier operating broadband PCS systems using GSM technology in the Charleston and Huntington, West Virginia BTA's under call signs KNLF795, WPOJ800, WPOJ801, WPOJ802, and WPOJ803. Key operates a total of 65 cell sites under these call signs, which cover a mountainous area.

Keystone is also a small, privately-held carrier, operating broadband PCS systems using GSM technology in various small eastern and mid-Pennsylvania BTAs, under call signs KNLG701, KNLG703, KNLG945, WPOJ725, WPOJ726, WPOJ727, WPOJ728, and WPOJ729. Keystone operates a cumulative total of 158 cell sites.

Each of the Petitioner-Small-Carriers is a "Tier III" wireless carrier, as defined in the Commission's decision in *Revision of the Commission's Rules to Ensure Compatibility with*

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Enhanced 911 Emergency Calling Systems Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, 17 FCC Rcd 14841 (2002) (“*Small Carrier E911 Extension*”).

In its *Order to Stay*, FCC 03-241, released October 10, 2003, the Commission temporarily granted the bulk of the request for stay of E911 deadlines sought by the Petitioner-Small Carriers. However, the Commission directed the Petitioner-Small Carriers (and others similarly situated) to provide supplemental factual support for their respective waiver requests within thirty days of the release date of that decision.

Since the release of the *Order to Stay*, the Petitioner-Small Carriers have been in contact with the PSAPs in their service territories and are assessing different possibilities for achieving E911 compliance in the most expeditious manner, and doing so in a way that enables each PSAP to utilize the information. However, in part because of moving developments on the technology front, the Petitioner-Small Carriers are still assessing various implementation alternatives, and are not in a position to authoritatively supplement the record at this time.

Virtually all of the PSAPs contacted by Petitioner-Small Carriers indicated they understand the problems that are being faced, and do not expect Phase II availability before the middle of 2004. The one exception was a rural PSAP that receives Phase I E911 from Petitioner-Small Carriers at this time, that has never requested Phase II E911, that has no capability to process Phase II information, either now or in the foreseeable future.

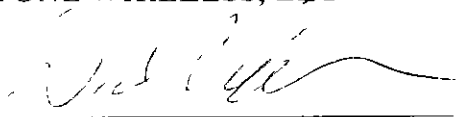
The Petitioner-Small Carriers are continuing to explore both interim and permanent solutions with vendors. Among other things, they are exploring the Nortel Timing Advanced Network Measurement Report (“TANMR”) technical solution for GSM, which is still in the testing stage and which was not a potential solution at the time Petitioner-Small Carriers filed their waiver request. Petitioner-Small Carriers have also been in contact with Motorola/Nokia,

who are jointly developing an "assisted-GPS" GSM handset on which they intend to start trials with the Tier I carriers in the first quarter of 2004, with a view toward commercial availability in the second half of 2004. The potential development of this new handset stands in marked contrast to the written advice (attached as an exhibit to the original waiver request) from Nokia to the effect that it had no plans to develop any E911-compliant handsets for GSM in the foreseeable future.

In light of the foregoing, it is simply not possible at this time for the Petitioner-Small Carriers to supplement the record respecting their waiver request. Accordingly, the Petitioner-Small Carriers hereby request an additional thirty days, to and including December 9, 2003, within which to supplement their waiver request.

Respectfully submitted,
KEY COMMUNICATIONS, LLC and
KEYSTONE WIRELESS, LLC

November 10, 2003

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